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IN THE REPUBLIC OF SOUTH AFRICA
ONLY

212-701-3435

May 12, 2021

Re: *City of St. Clair Shores Police and Fire Retirement System v. Credit Suisse Group AG, et al.*, No. 1:21-cv-03385

Dear Judge Buchwald:

We represent Credit Suisse Group AG, Thomas Gottstein, Lara J. Warner and David R. Mathers (together, the “Defendants”) in the above-captioned action, and write on behalf of all parties pursuant to Section 1.E of Your Honor’s Individual Practices to respectfully propose a schedule for further proceedings in this action.

On April 16, 2021, Plaintiff City of St. Clair Shores Police and Fire Retirement System (“Plaintiff”) commenced the above-captioned action by filing a complaint alleging violations of the Securities Exchange Act of 1934. All Defendants have agreed to accept service of the summons and complaint, while reserving their rights to assert any and all defenses in the matter, including, but not limited to, improper venue and lack of personal jurisdiction.

Recognizing that this action is governed by the procedures and timelines set forth under the Private Securities Litigation Reform Act of 1995 (“PSLRA”) for appointing Lead Plaintiff(s) and Lead Counsel, we have conferred with counsel for Plaintiff, and all parties respectfully request that the Court adjourn without date Defendants’ time to move, answer, or otherwise respond to the complaint and adopt the schedule set forth below in this action (or any future consolidated action in the event that any related complaints are filed):

- Pursuant to 15 U.S.C. § 78u-4(a)(3)(A), motions for appointment as Lead Plaintiff and approval of counsel shall be due on June 15, 2021;
- Oppositions to motions for appointment as Lead Plaintiff and approval of counsel shall be due on June 29, 2021;

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- Replies in further support of motions for appointment as Lead Plaintiff and approval of counsel shall be due on July 6, 2020;
- Lead Plaintiff's Amended Complaint shall be filed within 60 days after the Court's appointment of Lead Plaintiff and Lead Counsel;
- Defendants' deadline to move, answer, or otherwise respond to the Amended Complaint shall be 60 days after the filing of the Amended Complaint;
- Lead Plaintiff's opposition to Defendants' motion to dismiss shall be filed within 60 days after the filing of Defendants' motion to dismiss; and
- Defendants' reply in further support of their motion to dismiss shall be filed within 30 days after the filing of Lead Plaintiff's opposition to the same.

This is the parties' first request for an adjournment.

Respectfully Submitted,



Herbert S. Washer
Joel Kurtzberg
Sheila C. Ramesh
Adam S. Mintz
Tara H. Curtin

VIA ECF

The Honorable Naomi Reice Buchwald
United States District Judge
United States District Court, Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, NY 10007-1312

cc: All Counsel of Record (via ECF)

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